



PUBLIC NOTICE

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WIRELINE COMPETITION BUREAU PROVIDES DIRECTIONS AND FILING INFORMATION REGARDING CALLER ID AUTHENTICATION EXEMPTION CERTIFICATIONS

WC Docket No. 20-68

In this Public Notice, the Wireline Competition Bureau (Bureau) provides directions and filing information to voice service providers planning to seek an exemption from the Commission's caller ID authentication rules.¹

In March 2020, acting pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act, the Commission adopted rules requiring voice service providers to implement STIR/SHAKEN in the Internet Protocol (IP) portions of their network.² Thereafter, in September 2020, in accordance with the TRACED Act, the Commission adopted requirements for voice service providers to work toward caller ID authentication with respect to the non-IP portions of their networks and additionally adopted exemptions from its caller ID authentication requirements for providers that could demonstrate early implementation of caller ID technology.³

The Commission must obtain Office of Management and Budget (OMB) approval for the certification process by which voice service providers may seek an exemption and is in the process of doing so.⁴ The Bureau will publish a notice of OMB approval in the Federal Register and the rule regarding caller ID authentication exemption certifications will become effective upon publication of that notice. The Bureau will review the certifications and issue a list of parties that will receive an exemption on or before December 30, 2020.

TRACED Act Exemptions. The TRACED Act creates two exemptions: one for IP calls and one for non-IP calls.⁵ The Commission determined that, to receive the exemption for its IP networks, a voice service provider must: (i) have "completed the network preparations necessary to deploy the STIR/SHAKEN protocols on its network including, but not limited to, by participating in test beds and lab testing, or completing commensurate network adjustments to enable the authentication and validation

¹ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, FCC 20-136, at 59, para. 119 (Oct. 1, 2020) (*Second Caller ID Authentication Report and Order*).

² *Call Authentication Trust Anchor; Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 20-67 and 17-97, Report and Order and Further Notice of Proposed Rulemaking, FCC 20-42, at 12, para. 24 (Mar. 31, 2020).

³ *Second Caller ID Authentication Report and Order*.

⁴ *Id.* at 76, para. 163.

⁵ *Id.* at 53, para. 103.

of calls on its network consistent with the STIR/SHAKEN framework”;⁶ (ii) have “demonstrated its voluntary agreement to participate with other voice service providers in the STIR/SHAKEN framework by completing formal registration (including payment) and testing with the Policy Administrator”;⁷ (iii) have “completed the necessary network upgrades to at least one network element (e.g., a single switch or session border controller) to enable the authentication and verification of caller ID information consistent with the STIR/SHAKEN standards”;⁸ and (iv) “reasonably foresee[] that it will have completed all necessary network upgrades to its network infrastructure to be able to authenticate and verify caller ID information for all SIP calls exchanged with STIR/SHAKEN-enabled partners by June 30, 2021.”⁹ The Commission further determined that, to receive the exemption for its non-IP networks, a voice service provider must: (i) be “working to develop a non-IP authentication solution”;¹⁰ and (ii) “reasonably foresee[] that it will have completed all necessary network upgrades to its infrastructure to be able to authenticate and verify caller ID information for all non-IP calls originating or terminating on its network as provided by a standardized caller ID authentication framework for non-IP networks.”¹¹

Certification Requirements. Each voice service provider that seeks to qualify for an exemption will be required to submit one certification that the company meets the stated criteria for the IP networks exemption, non-IP networks exemption, or both exemptions.¹² An officer of the voice service provider seeking an exemption will be required to sign the certification stating under penalty of perjury that the officer has personal knowledge that the company meets each criterion.¹³ Each voice service provider seeking an exemption will be required to submit an accompanying statement explaining, in detail, how the company meets each of the prongs of each applicable exemption so that the Commission can verify the accuracy of the certification.¹⁴

Certification Filing Instructions. All certifications and supporting statements will be required to be filed electronically in WC Docket No. 20-68, Exemption from Caller ID Authentication Requirements, in the Commission’s Electronic Comment Filing System (ECFS), available at <http://www.fcc.gov/ecfs>, no later than December 1, 2020.¹⁵ Filers will be able to request that any materials or information submitted to the Commission in their certification be withheld from public inspection pursuant to the procedures set forth in section 0.459 of the Commission's rules.¹⁶

⁶ *Id.* at 54, para. 107.

⁷ *Id.* at 55, para. 109.

⁸ *Id.* at 56, para. 111.

⁹ *Id.* at 56-57, para. 113.

¹⁰ *Id.* at 57-58, para. 115.

¹¹ *Id.* at 58, para. 116.

¹² *Id.* at 58, para. 117.

¹³ *Id.* at 59, para. 118.

¹⁴ *Id.*

¹⁵ *Id.* at 59, para. 119.

¹⁶ 47 CFR § 0.459. Due to the Covid-19 pandemic the Commission cannot accept hand delivered filings. *See FCC Provides Further Instructions Regarding Submission of Confidential Materials*, Public Notice, DA 20-361 (Mar. 31, 2020).

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